

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Bryan T. Maloney	: No. 16-10738 - mdc
Cindy G. Maloney	:
	:
	: Chapter 13
Americredit National Services Inc	:
dba GM Financial	:
	:
v.	:
	:
Bryan T. Maloney	:
Cindy G. Maloney	:

Response to Motion for Relief filed by **Americredit National Services Inc**
dba GM Financial

Debtors, by and through their attorney, responds as follows:

1-6. Admitted.

7 Denied. Debtor Wife was out of work for a period of time but is now back to work.

Debtors need the vehicle to travel to work to complete their plan, debtors have the ability to continue making payments until the loan is paid in full, and there is significant equity in the vehicle to protect creditor's interest.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

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